

May 22, 2007

Federal Election Commission
Reports Analysis Division
Attn: Marlene R. Daughtrey
999 E Street, NW
Washington, DC 20463

ID# C00053553
RE: Amended October Monthly Report (09/01/08-09/30/08)

Dear Ms. Daughtrey:

This letter is in response to your letter dated April 29, 2009 regarding the NRA Political Victory Fund's amended October Monthly Report (09/01/08 - 09/30/08) notifying us of a failure to file 48 hour reports. The letter also questioned an expenditure listed as Prepay Media that is shown on Schedule B, Line 21.

The Prepay Media expenditure of \$946,809.00 dated September 4, 2008, is prepayment of multiple newspapers ads that we ran just before the General Election in November. This expenditure was moved from Schedule B, Line 21 to Schedule B, Line 29 (\$18,116.00) and Schedule E (\$928,693.00) and fully itemized on October 28, 2008. Dissemination of the newspaper ads began in various markets on October 28, 2009 with most of the ads (totaling \$625,279.00) running Election Day, November 4, 2008, outside of the 24 Hour Notice Period.

In your letter, there was a spreadsheet that showed entries pulled from Schedule E. These disbursements were prepayments that were fully itemized during the reporting period that they were paid. Most of the independent expenditures listed were disseminated in a later reporting period. Attached is that spreadsheet with two additional columns listing the 24 /48 Reported amount and the disclosure date. There needs to be some clarification with some disbursements.

The disbursement reported for Barack Obama on 09/08/2008 for Consulting Fees, should have been reported on Line 21 with no allocation to any candidate. An amended October Monthly Report will be filed to reflect this correction.

The Newspaper Ad disbursement reported for Barack Obama on 09/09/2008 in the amount of \$35,204.00 was not disseminated until 11/03/2008. This dissemination fell outside of the independent expenditures 24 Hour notice period and a 24 Hour Report was not filed.

The Radio Ad allocated to Senator Norm Coleman and Al Franken in the amount of \$49,000.00 each on 09/26/2008, was disseminated two weeks later with the addition of another candidate. The 48 Hour Report filed 10/10/2008 reflects the correct allocation of \$24,500.00 for the two candidates named. An amended October Monthly Report will be filed to add the additional candidate to the radio air time purchase.

I can be reached at 703-267-1155 should you have any additional questions.

Sincerely,

Image# 29933793295
ETEXT ATTACHMENT

Mary Rose Adkins
Treasurer

Independent Expenditures

24 / 48 Hour Report

Names of Payee Date Payment Purpose Candidate Reported Amt Date

Novacon Promotional Products 09/25/08 321.62 Bumper Stickers Andal, Dean 343.30 9/18/08
Edmonds Associates, Inc. 09/16/08 13,212.00 Billboard Advertising Coleman, Norm 13,212.00 10/07/08
Edmonds Associates, Inc. 09/16/08 1,394.71 Billboard Production Cost Coleman, Norm 1,394.71 10/07/08
Novacon Promotional Products 09/25/08 643.26 Bumper Stickers Coleman, Norm 686.59 09/18/08
Edmonds Associates, Inc. 09/26/08 49,000.00 Radio Ads Coleman, Norm 24,500.00 10/10/08
Novacon Promotional Products 09/25/08 321.62 Bumper Stickers Dole, Elizabeth 343.30 09/18/08
Edmonds Associates, Inc. 09/28/08 23,165.00 TV Advertising Dole, Elizabeth 23,165.00 10/08/08
Edmonds Associates, Inc. 09/16/08 4,905.00 Billboard Advertising Feeney, Tom 4,905.00 10/07/08
Edmonds Associates, Inc. 09/16/08 3,295.29 Billboard Production Cost Feeney, Tom 3,295.29 10/07/08
Edmonds Associates, Inc. 09/26/08 49,000.00 Radio Ads Franken, Al 24,500.00 10/10/08
Edmonds Associates, Inc. 09/25/08 23,165.00 TV Advertising Hagan, Kay 23,165.00 10/08/08
Edmonds Associates, Inc. 09/16/08 7,882.00 Billboard Advertising Hay, Sydney 7,882.00 10/07/08
Edmonds Associates, Inc. 09/16/08 2,148.23 Billboard Production Cost Hay, Sydney 2,148.23 10/07/08
Edmonds Associates, Inc. 09/16/08 5,588.00 Billboard Advertising Hayes, Robin 5,588.00 10/08/08
Edmonds Associates, Inc. 09/16/08 3,024.70 Billboard Production Cost Hayes, Robin 3,024.70 10/07/08
Novacon Promotional Products 09/25/08 321.62 Bumper Stickers Hayes, Robin 343.30 09/18/08
Edmonds Associates, Inc. 09/16/08 4,706.00 Billboard Advertising Knollenberg, Joe 4,706.00 10/07/08
Edmonds Associates, Inc. 09/16/08 1,395.29 Billboard Production Cost Knollenberg, Joe 1,395.29 10/07/08
Edmonds Associates, Inc. 09/16/08 6,471.00 Billboard Advertising Kuhl, John 6,471.00 10/07/08
Edmonds Associates, Inc. 09/16/08 664.70 Billboard Production Cost Kuhl, John 664.70 10/07/08
Novacon Promotional Products 09/25/08 321.62 Bumper Stickers Kuhl, John 343.30 09/18/08
Edmonds Associates, Inc. 09/04/08 11,962.50 Newspaper Ads Obama, Barack 11,700.00 09/04/08
Edmonds Associates, Inc. Newspaper Ads Production Obama, Barack 262.50 09/04/08
Edmonds Associates, Inc. 09/04/08 11,962.50 Newspaper Ads Obama, Barack 11700.00 09/04/08
Edmonds Associates, Inc. Newspaper Ad Production Cost Obama, Barack 262.50 09/04/08
Meridian Resources, LLC 09/08/08 2,000.00 Consulting Fees Obama, Barack Should be Line 21
Edmonds Associates, Inc. 09/09/08 29,071.00 Newspaper Ads Obama, Barack 29,071.00 10/30/08
Edmonds Associates, Inc. 09/09/08 35,204.00 Newspaper Ads Obama, Barack Ad Ran 11/03/08 N/A
Edmonds Associates, Inc. 09/16/09 151,945.00 Magazine Ads Obama, Barack 27,765.00 09/24/08
Magazine Ads Obama, Barack 7,867.00 10/09/08
Magazine Ads Obama, Barack 1,261.00 09/24/08
Magazine Ads Obama, Barack 1,261.00 10/02/08
Magazine Ads Obama, Barack 1,261.00 10/09/08
Magazine Ads Obama, Barack 3,786.00 10/02/08
Magazine Ads Obama, Barack 3,426.00 10/02/08
Magazine Ads Obama, Barack 29,356.00 09/04/08
Magazine Ads Obama, Barack 29,356.00 10/02/08
Magazine Ads Obama, Barack 22,705.00 09/24/08
Magazine Ads Obama, Barack 6,483.00 09/24/08
Magazine Ads Obama, Barack 8,709.00 09/04/08
Magazine Ads Obama, Barack 8,709.00 10/02/08
Edmonds Associates, Inc. 09/16/08 8,680.00 Magazine Ad Production Obama, Barack 450.00 09/24/08

ETEXT ATTACHMENT

Magazine Ad Production Obama, Barack 450.00 10/09/08
Magazine Ad Production Obama, Barack 216.67 09/24/08
Magazine Ad Production Obama, Barack 216.67 10/02/08
Magazine Ad Production Obama, Barack 216.66 10/09/08
Magazine Ad Production Obama, Barack 450.00 10/02/08
Magazine Ad Production Obama, Barack 450.00 10/02/08
Magazine Ad Production Obama, Barack 225.00 09/04/08
Magazine Ad Production Obama, Barack 225.00 10/02/08
Magazine Ad Production Obama, Barack 450.00 09/24/08
Magazine Ad Production Obama, Barack 450.00 09/24/08
Magazine Ad Production Obama, Barack 225.00 09/04/08
Magazine Ad Production Obama, Barack 225.00 10/02/08

Edmonds Associates, Inc. 09/16/08 7,370.53 Billboard Advertising Obama, Barack 7,370.53 10/07/08
Edmonds Associates, Inc. 09/16/08 13,212.00 Billboard Advertising Obama, Barack 13,212.00 10/07/08
Edmonds Associates, Inc. 09/16/08 8,117.50 Billboard Advertising Obama, Barack 8,117.50 10/07/08
Edmonds Associates, Inc. 09/16/08 799.37 Billboard Production Cost Obama, Barack 799.37 10/07/08
Edmonds Associates, Inc. 09/16/08 1,394.70 Billboard Production Cost Obama, Barack 1,394.70 10/07/08
Edmonds Associates, Inc. 09/16/08 332.35 Billboard Production Cost Obama, Barack 332.35 10/07/08
Edmonds Associates, Inc. 09/18/08 572,159.75 TV Advertising Obama, Barack 572,159.75 09/24/08
Edmonds Associates, Inc. 09/18/08 146,781.60 Radio Ads Obama, Barack 146,781.60 09/24/08
Edmonds Associates, Inc. 09/25/08 580,845.00 TV Advertising Obama, Barack 532,742.00 10/08/08
TV Advertising Obama, Barack 48,103.00 10/15/08

Edmonds Associates, Inc. 09/16/08 7,276.00 Billboard Advertising Stivers, Steve 7,276.00 10/07/08
Edmonds Associates, Inc. 09/16/08 4,603.53 Billboard Production Cost Stivers, Steve 4,603.53 10/07/08
Edmonds Associates, Inc. 09/16/08 8,423.47 Billboard Advertising Walberg, Timothy 8,423.47 10/07/08
Edmonds Associates, Inc. 09/16/08 913.57 Billboard Production Cost Walberg, Timothy 913.57 10/07/08